

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

YVONNE JONES,
Plaintiff,

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v.

CIVIL ACTION NO. 18-202406

WAL-MART STORES TEXAS, LLC
Defendant.

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PLAINTIFF'S DESIGNATION OF EXPERTS

COMES NOW, Plaintiff Yvonne Jones, and file this, his Designation of Experts. Plaintiff hereby designates the following individuals as experts and expect to call the following individuals to testify at trial:

Kelly Golda
WEXCO INTERNATIONAL CORPORATION
1464 E. Whitestone Blvd., Suite 1101
Cedar Park, TX 78613
(512) 535-0749

Mr. Golda will testify as to the condition of Defendant's premises at the time of incident, including but not limited to the design, construction, maintenance and management of Defendant's property. Mr. Golda will also testify as to the relevant building codes, safety regulations, industry standards and their application to Defendant's property. Mr. Golda's opinions are based on his education, experience, and training in the fields of construction, safety engineering, safety regulations, building codes, and forensic engineering. Please find attached Mr. Golda's Preliminary Report of Findings as *Exhibit "1,"* with accompanying exhibits, which include Mr. Golda's C.V., as well as applicable building codes and relevant regulations. Please also find attached Mr. Golda's testimony list as *Exhibit "2."*

In order to retain Mr. Golda, Plaintiff submitted a retainer of \$2,500 and agreed to pay an hourly fee rate of \$250. To the extent necessary, Plaintiff further designates all medical providers listed in her Response to Defendant's Request for Disclosure as non-retained experts. Any opinions elicited from those providers or the records generated from Plaintiff's treatment will be

based upon a reasonable degree of medical probability. Plaintiff reserves the right to supplement this Designation and/or to elicit testimony from any individuals and/or entities designated by Defendants.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served in compliance with the Federal Rules of Civil Procedure on this 28th day of May, 2019 to the following counsel of record:

John A. Ramirez
Steven J. Maguire
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Via Facsimile (713) 622-8077


Mohammed H. Nabulsi